UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-cr-80041-RLR(s)

21 U.S.C. § 841(a)(1) 21 U.S.C. § 846 18 U.S.C. § 924(c)

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(d)(1)

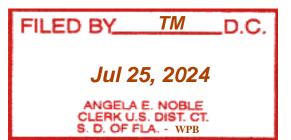
21 U.S.C. § 853

UNITED STATES OF AMERICA

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

v.

Defendant.



SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1 Conspiracy to Distribute a Controlled Substance (21 U.S.C. § 846)

Beginning in and around January 2022, the exact date being unknown to the Grand Jury, and continuing through on or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and willfully combine, conspire, confederate, and agree with Darnell Julio Mendez, and other persons known and unknown to the Grand Jury, to possess with intent to distribute, and distribute, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), all in violation of

Title 21, United States Code, Section 846.

With respect to the defendant, **SAMANTHA HANA YI**, a/k/a "China," a/k/a "Gina," it is further alleged the controlled substance involved in the conspiracy attributable to the defendant as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to the defendant, is 40 grams or more of a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance, 10 grams or more of a mixture and substance containing a detectable amount of (N-(4-Fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, that is, Fluorofentanyl, and that death resulted from the use of such substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(vi).

COUNT 2 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about March 30, 2022, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance, and (N-(4-Fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, that is, Fluorofentanyl, and that death resulted from the use of such substance.

COUNT 3 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about December 22, 2022, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marihuana.

COUNT 4 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about December 27, 2022, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this

violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 5 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about January 4, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 6 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about January 10, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this

violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of Cocaine, a Schedule II Controlled Substance.

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marihuana.

COUNT 7 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about January 25, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 8 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about February 1, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 9 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about February 9, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 10 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about February 23, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 11 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about March 1, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 12 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about March 8, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 13 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about March 23, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 14 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about April 13, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 15 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about June 2, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Sections 841(b)(1)(B)(vi) and (C), it is further alleged that this violation involved 10 grams or more of a mixture and substance containing a detectable amount of (N-(4-Fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, that is Fluorofentanyl, and N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 16 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about July 26, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Sections 841(b)(1)(B)(vi) and (C), it is further alleged that this violation involved 10 grams or more of a mixture and substance containing a detectable amount of (N-(4-Fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, that is Fluorofentanyl, and N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 17 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about December 12, 2023, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance.

COUNT 18

Possession with Intent to Distribute a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, Fentanyl, a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of (N-(4-Fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, that is Fluorofentanyl, and a mixture and substance containing a detectable amount of Cocaine, a Schedule II Controlled Substance.

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that this violation involved a mixture or substance containing a detectable amount of marihuana.

COUNT 19 Possession of a Firearm in Furtherance of a Drug Trafficking Crime (18 U.S.C. § 924(c))

On or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendant,

did knowingly possess a firearm in furtherance of a drug trafficking crime, a felony offense for which the defendant may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 841, as set forth in Count 18 of this Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 20 Possession of a Firearm by a Prohibited Person (18 U.S.C. § 922(g))

On or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China,"

did knowingly possess a firearm and ammunition, in and affecting interstate and foreign commerce, knowing that she had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the firearm and ammunition were:

- (i) one (1) Taurus International Mfg. (Brazil), Model 85, .38 Special revolver,
- (ii) four (4) rounds of .38 Special caliber ammunition,
- (ii) one (1) Maverick Arms (Mossberg), Model 88, 12-Gauge shotgun,
- (iii) one (1) Carl Walther, PPS, .40 S&W pistol,
- (iv) one (1) Smith & Wesson, Model 10-5, .38 Special revolver,
- (v) one (1) North American Arms, NAA-22M, .22 revolver,
- (vi) one (1) Palmetto State Armory, PA-15, 5.56x45 rifle,
- (vii) one (1) Glock Inc., 42, .380 Auto pistol,
- (viii) one (1) Beretta, 92FS, 9mm pistol,

- (ix) one (1) Kel-Tec, PLR-16, 5.56 pistol,
- (x) one (1) FN Herstal, FNS-9, 9mm pistol,
- (xi) one (1) Ruger, Mark II, .22 pistol,
- (xii) one (1) Sig Sauer, P365, 9mm pistol,
- (xiii) one (1) Glock GMBH, 26, 9mm pistol, and
- (xiv) one (1) Smith & Wesson, Bodyguard 380 (BG380), .380 pistol.

FORFEITURE ALLEGATIONS

- 1. The allegations of this Superseding Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina," has an interest.
- 2. Upon conviction of a violation of Title 21, United States Code, Section(s) 841 and/or 846, as alleged in this Superseding Indictment, the defendant shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, pursuant to Title 21, United States Code, Section 853.
- 3. Upon conviction of a violation of Title 18, United States Code, Section(s) 922(g) and/or 924(c), or any other criminal law of the United States, as alleged in this Superseding Indictment, the defendant shall forfeit to the United States any firearm and ammunition involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924(d)(1).

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All pursuant to and Title 18, United States Code, Section 924(d)(1), and Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON

MARKENZY LAPOINTE

UNITED STATES ATTORNEY

ADAM C. MCMICHAE

ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA	CASE NO.: 24-cr-80041-RLR(s)
v. SAMANTHA HANA YI, a/k/a "China," a/k/a "Gina,"	CERTIFICATE OF TRIAL ATTORNEY
Defendants.	Superseding Case Information:
Court Division (select one) Miami Key West FTP FTL WPB	New Defendant(s) (Yes or No) No Number of New Defendants Total number of new counts
witnesses and the legal complexities of the Inc 2. I am aware that the information supplied on the	f the indictment, the number of defendants, the number of probable dictment/Information attached hereto. his statement will be relied upon by the Judges of this Court in setting under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No List language and/or dialect: English	
4. This case will take 10 days for the parties	to try.
I □ 0 to 5 days □ Petty II ☑ 6 to 10 days □ Mind	ck only one) / or demeanor
6. Has this case been previously filed in this	
If yes, Judge Rosenberg 7. Has a complaint been filed in this matter?	Case No. 24-cr-80041-RLR
If yes, Magistrate Case No. 24-8095-RMM	<u> </u>
8. Does this case relate to a previously filed I If yes, Judge	matter in this District Court? (Yes or No) No
9. Defendant(s) in federal custody as of Mai	rch 7, 2024
10. Defendant(s) in state custody as of11. Rule 20 from the District of	
12. Is this a potential death penalty case? (Yes	or No) No_
13. Does this case originate from a matter pen	ding in the Northern Region of the U.S. Attorney's Office
prior to August 8, 2014 (Mag. Judge Shan 14. Does this case originate from a matter pen	iek Maynard? (Yes or No) No ding in the Central Region of the U.S. Attorney's Office prior
to October 3, 2019 (Mag. Judge Jared Stra	uss? (Yes or No) No
	of or consultation with Magistrate Judge Eduardo I. Sanchez ffice, which concluded on January 22, 2023? No
16. Did this matter involve the participation of	of or consultation with now Magistrate Judge Marta Fulgueira torney's Office, which concluded on March 5, 2024? No
	By: ADAM McMCHAEL
	Assistant United States Attorney

FL Bar No.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Samantha Yi, aka "China," a/k/a "Gina" Case No: 24-cr-80041-RLR(s) Count #: 1 Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance (40 grams or more of Fentanyl & 10 grams or more of Fluorofentanyl) Resulting in the Death of Another 21 U.S.C. §§ 846 and 841(b)(1)(B)(vi) * Max. Term of Imprisonment: Life * Mandatory Min. Term of Imprisonment (if applicable): 20 Years * Max. Supervised Release: Minimum 3 years to life term * Max. Fine: \$5,000,000 * Special Assessment: \$100.00 Count #: 2 Distribution of a Controlled Substance (Fentanyl & Fluorofentanyl) Resulting in the Death of Another 21 U.S.C §§ 841(a)(1) and (b)(1)(C) * Max. Term of Imprisonment: Life * Mandatory Min. Term of Imprisonment (if applicable): 20 Years * Max. Supervised Release: 3 Years to Life * Max. Fine: \$1,000,000 * Special Assessment: \$100.00 Counts #: 3, Distribution of a Controlled Substance (Fentanyl & Marihuana) 21 U.S.C §§ 841(a)(1) and (b)(1)(C), (b)(1)(D) * Max. Term of Imprisonment: 20 Years * Mandatory Min. Term of Imprisonment (if applicable): n/a * Max. Supervised Release: 3 Years to Life * Max. Fine: \$1,000,000 * Special Assessment: \$100.00

Counts #: 4, 5, 7, 8, 9, 11, 12, 14, 17

Distribution of a Controlled Substance (Fentanyl)

21 U.S.C §§ 841(a)(1) and (b)(1)(C)

- * Max. Term of Imprisonment: 20 Years
- * Mandatory Min. Term of Imprisonment (if applicable): n/a
- * Max. Supervised Release: 3 Years to Life
- * Max. Fine: \$1,000,000
- * Special Assessment: \$100.00

Counts #: 6

Distribution of a Controlled Substance (Fentanyl, Cocaine, & Marihuana)

21 U.S.C §§ 841(a)(1) and (b)(1)(C), (b)(1)(D)

- * Max. Term of Imprisonment: 20 Years
- * Mandatory Min. Term of Imprisonment (if applicable): n/a
- * Max. Supervised Release: 3 Years to Life
- * Max. Fine: \$1,000,000
- * Special Assessment: \$100.00

Counts #: 10-13,

Distribution of a Controlled Substance (Fentanyl)

21 U.S.C §§ 841(a)(1) and (b)(1)(C)

- * Max. Term of Imprisonment: 20 Years
- * Mandatory Min. Term of Imprisonment (if applicable): n/a
- * Max. Supervised Release: 3 Years to Life
- * Max. Fine: \$1,000,000
- * Special Assessment: \$100.00

Counts #: 15, 16

Distribution of a Controlled Substance (10 grams or more of Fluorofentanyl, & Fentanyl)

21 U.S.C §§ 841(a)(1) and (b)(1)(B)(vi), (b)(1)(C)

- * Max. Term of Imprisonment: 40 Years
- * Mandatory Min. Term of Imprisonment (if applicable): n/a
- * Max. Supervised Release: 3 Years to Life
- * Max. Fine: \$1,000,000
- * Special Assessment: \$100.00

Count #: 18

Possession with Intent to Distribute a Controlled Substance (Fentanyl, Fluorofentanyl, Cocaine & Marihuana).

21 U.S.C §§ 841(a)(1) and (b)(1)(B)(C), (b)(1)(D)

- * Max. Term of Imprisonment: 20 Years
- * Mandatory Min. Term of Imprisonment (if applicable): n/a
- * Max. Supervised Release: 3 Years to Life
- * Max. Fine: \$1,000,000
- * Special Assessment: \$100.00

Count #: 19

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

18 U.S.C § 924(c)(1)(A)(i)

- * Max. Term of Imprisonment: Life
- * Mandatory Min. Term of Imprisonment (if applicable): 5 years consecutively to any other sentence of imprisonment
- * Max. Supervised Release: 5 Years
- * Max. Fine: \$250,000
- * Special Assessment: \$100.00

Count #: 20

Possession of a Firearm and Ammunition by a Prohibited Person - Convicted Felon

18 U.S.C. § 922(g)(1)

- * Max. Term of Imprisonment: 15 Years
- * Mandatory Min. Term of Imprisonment (if applicable): n/a
- * Max. Supervised Release: 3 Years
- * Max. Fine: \$250,000
- * Special Assessment: \$100.00